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July 28, 2010

VIA ECF

Chief Magistrate Judge Steven M. Gold
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11021

Re: First Keystone Consultants, et al.
v. Schlesinger Electrical Contractors, et al.
United States District Court, Docket No. 10-cv-0696 (KAM) (SMG)

Dear Chief Magistrate Gold:

We represent Defendant/Judgment Creditor Schlesinger Electrical Contractors Inc., as well Defendant Jacob Levita (collectively referred herein as "Schlesinger") in the above referenced action. We are writing to ask for a modification to the schedule Ordered by Your Honor on Schlesinger's Motion for a Protective Order.

Earlier today, Your Honor issued the following Order:

ORDER granting [18] Motion for Protective Order: Defendant may file its motion for a protective order by August 6. Plaintiff's opposition is due August 20. Defendant may submit a reply by August 27. The court will hear the motion at the conference already set for September 14. So Ordered by Chief Magistrate Judge Steven M. Gold on 7/28/2010.
(Vasquez, Lea)

Please be advised that Melvin Kalish, the principal of the firm and lead attorney on this matter, is currently out of the country (in "the bush" of Africa) and will not be returning until August 6, 2010. Additionally, due to the locales that Mr. Kalish is seeing, he is unreachable either by cell phone or the internet.

Based upon his unavailability, Schlesinger requests a modification to Your Honor's Order, and proposes the following schedule:

Chief Magistrate Judge Steven M. Gold

July 28, 2010

Page 2

Defendants' moving papers to be submitted on or before August 18, 2010. Plaintiffs' opposition due on or before September 1, 2010. Defendants' Reply due on or before September 8, 2010

Thank you for your consideration.

Respectfully submitted,



JOSHUA D. SPITALNIK

JDS:jmc

cc: All counsel (via ECF)
Schlesinger Electrical Contractors, Inc.